

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

**CHMURA ECONOMICS &
ANALYTICS, LLC,**

**Plaintiff/Counterclaim
Defendant,**

v.

RICHARD LOMBARDO,

**Defendant/Counterclaim
Plaintiff.**

Case No. 3:19-cv-813-REP

**PLAINTIFF AND COUNTERCLAIM DEFENDANT'S
MOTION FOR SUMMARY JUDGMENT**

Plaintiff and Counterclaim Defendant Chmura Economics & Analytics, LLC, by counsel and pursuant to Fed. R. Civ. P. 56, respectfully moves for summary judgment on its Amended Complaint (ECF No. 12) and on Defendant and Counterclaim Plaintiff Richard Lombardo's Counterclaim (ECF No. 19) for the reasons set forth in the accompanying Memorandum. Specifically, Chmura respectfully requests:

(1) an Order providing that Lombardo is liable for breach of contract, conversion, and misappropriation of trade secrets as a matter of law, as set forth in Counts I, III, and IV of the Amended Complaint, in an amount to be determined at trial;

(2) a declaratory judgment that Lombardo's Confidentiality, Non-Competition, and Non-Solicitation Agreement is enforceable, as set forth in Count II of the Amended Complaint; and

(3) an Order granting summary judgment in Chmura's favor on all five Counts of Lombardo's Counterclaim, and dismissing those claims with prejudice.

Dated: May 15, 2020

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of May, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will send a notification of such filing (NEF) to all counsel of record.

/s/

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